DOCUMENT RESUME

ED 385 659 UD 030 566

AUTHOR	Rogers, Margot
TITLE	Planning for Title I Programs. Guidelines for Parents, Advocates and Educators.
INSTITUTION	Center for Law and Education, Washington, DC.
REPORT NO	ISBN-0-912585-08-0
PUB DATE	95
NOTE	40p.
AVAILABLE FROM	Center for Law and Education, Dept. A, 1875 Connecticut Avenue, N.W., Suite 510, Washington, DC 20009 ($4 plus shipping; quantity discounts of 10 to 25% depending on quantity ordered).
PUB TYPE	Guides - Non-Classroom Use (055)
EDRS PRICE	MF01/PC02 Plus Postage.
DESCRIPTORS	*Advocacy; Citizen Participation; *Community Involvement; Compensatory Education; *Educational Change; Educationally Disadvantaged; Educational Planning; Elementary Secondary Education; *Federal Legislation; *Parent Participation; Program Development; School Restructuring; Standards
IDENTIFIERS	*Elementary Secondary Education Act Title I; *Targeted Assistance Program

ABSTRACT

In October 1994 the President signed into law the "Improving America's Schools Act." Title I, the largest primary and secondary federal education program was reauthorized by this legislation, which, among other things rewrote the Elementary and Secondary Education Act. The reauthorized law provides parents, advocates, and school communities with new opportunities to use Title I as a tool for school reform. The same high standards required for all students are now required for Title I students, and program development standards call for high quality and improved content. However, the reauthorization alone will not guarantee educational improvement. This booklet suggests ways in which parents and interested community members can use Title I for school improvement. General information about Title I and its details are followed by specific advice about what to do for school level planning and advocacy and schoolwide programs. Special attention is paid to the Targeted Assistance Schools defined under Title I. A sample school parent involvement compact is presented. Organizations and resources parents can draw on for help are listed in Section 5. An appendix contains an excerpt from the Title I law. (SLD)

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PLANNING FOR TITLE I PROGRAMS

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GUIDELINES FOR PARENTS, ADVOCATES AND EDUCATORS

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MARGOT ROGERS ▪ CENTER FOR LAW AND EDUCATION

About the Author

Margot Rogers is a staff attorney at the Center for Law and Education.

About the Center for Law and Education

The Center for Law and Education (CLE) provides support services on education issues to advocates working on behalf of low-income students and parents.

About the Title I and School Reform Advocacy Project

CLE's National Title I and School Reform Advocacy Project supports parents, legal services attorneys, other community advocates, and school personnel in their efforts to improve Title I programs and use Title I as a starting point for broad-based educational reform. The Project seeks to address core programmatic quality issues, such as the quality of curriculum and instruction in Title I schools, whether these schools are enabling students to meet the state's high standards, and the effectiveness of parental involvement programs.

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District of Columbia residents, add 5.75% sales tax.
Center for Law and Ed FIN 04-2594077

ISBN 0-912585-08-0

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Funds for the preparation of this guide were provided by The Joyce Foundation. The opinions expressed are those of the author and should not be construed as representing the opinions or policies of The Joyce Foundation.

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I. New Opportunities for Improving the Quality of Education of Low-Income Students

In October, 1994, President Clinton signed into law the "Improving America's Schools Act".[1] Title I, the largest primary and secondary federal education program (over 7 billion dollars in FY95), was reauthorized in this legislation, which among other things, rewrote the Elementary and Secondary Education Act.[2]

Although Title I[3] was established in 1965 to provide "extra" educational services to the nation's poorest and lowest achieving students, history indicates that for nearly thirty years the program has failed to meet its potential.

The reauthorized law provides parents, advocates, and school communities with a new opportunity to use Title I as a tool for broader school reform. With renewed energy and collective advocacy, communities can work to ensure that Title I is used to provide a quality education for our nation's low-income students.

A New Framework for Program Quality

The reauthorized Title I provides strong legal handles for ensuring a quality education for Title I students. The law requires states to use the same high standards for Title I students as they do for all other students.[4] It requires schools and local education agencies (LEAs) to develop programs that will enable students to meet the standards, as measured by performance on state assessments which are aligned with the standards.[5] Further the law calls for high quality professional staff to teach Title I students a challenging curriculum, and effectively designed individual assistance to students who are having difficulty achieving the standards. Parents have the right to be involved in planning their children's education, and to see that their children's schools comply with the requirements of Title I.[6]

Through a series of requirements about the content of their Title I programs,

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[1] Pub. L. 103-382. 20 U.S.C. § 6301 *et seq.* The effective date of the Act is July 1, 1995.

[2] The legislation included most primary and secondary education programs, with two notable exceptions: the Individuals with Disabilities Education Act (IDEA) and the Carl D. Perkins Vocational and Applied Technology Education Act. Both the Perkins Act and IDEA are up for review in 1995.

[3] The 1994 reauthorization of the Elementary and Secondary Education Act changed the name from Chapter 1 back to Title I.

[4] For specific requirements regarding state standards, *see generally* Elementary and Secondary Education Act, as amended by Improving America's Schools Act of 1994, (hereinafter ESEA), Public Law 103-382, Section 1111(b); 20 U.S.C. § 6311(b).

[5] For the specific programmatic requirements the law makes of school districts and schools, *see generally* ESEA, at sections 1112, 1114, and 1115; 20 U.S.C. § 6312, 6314, and 6315.

[6] For specific parent involvement requirements of the law, *see generally* ESEA, at section 1118; 20 U.S.C. 6319.

the reauthorized law charges schools and LEAs with ensuring that Title I students are not given a second rate education. And the law mandates that schools and LEAs succeed in providing quality programs which enable Title I students to meet the state standards. Schools and LEAs which continually fail their students will be put in "improvement" — during which they must develop and implement a plan to make their program more effective. Schools and LEAs in "improvement" which continue to fail will have sanctions imposed against them, including, for example, the reconstitution of school staff or the withholding of funds.[7]

These better legal handles do not guarantee improved Title I programs. Without effective advocacy to ensure proper implementation, Title I students across the country could be cheated out of the quality education the new law promises. One need only examine the history of Chapter 1 implementation after the 1988 reauthorization to understand the risk. Although the 1988 law was designed to ensure the active participation of parents in the decision-making process, Chapter 1 programs were often run with minimal input from parents concerning the core elements of the program. Many programs have not, as the law requires, ensured the integration between students' Chapter 1 and regular classes. Further, rather than ensuring that Chapter 1 students are being taught the "basic and advanced skills that all students are expected to master," many programs have pulled students out of regular classes and taught them watered-down curricula which virtually guaranteed that students would never catch up to their peers, further undermining the goals of the program.

Schoolwide Programs

The new law relaxes the requirements schools must meet in order to become schoolwide programs — schools that have a high enough population of low-income students that they can use their Title I funds to improve the educational program of the entire school, instead of targeting the funds on only those students who are furthest behind.[8] With proper implementation, this represents great possibility for change.

The law makes many specific requirements of schools implementing schoolwide programs, including that: schools use reform strategies based on effective means of improving the achievement of children; students be taught by highly qualified professional staff members who have the appropriate professional development opportunities they need to provide effective instruction to Title I students; Title I be coordinated with other programs; and schools provide individual assistance to those students within a schoolwide program who need extra assistance to meet the state standards. Without hard work on the part of entire school communities to ensure that these requirements are met, and that Title I is the catalyst for real reform, Title I funds in schoolwide programs have the potential to become general aid to existing mediocre programs.

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[7] For specific requirements concerning school and district improvement, and possible sanctions, *see generally* ESEA, at section 1117; 20 U.S.C § 6318.

[8] Under 1988 law, schools with at least 75% low-income students qualified for schoolwide status. Effective July 1, 1995, the threshold is 60%; the threshold lowers to 50% on July 1, 1996. *See* ESEA, at section 1114(a)(1); 20 U.S.C. § 6314(a)(1).

Planning for schoolwide programs is an in-depth process, for which the law also spells out specific requirements. The law requires that a school implementing a schoolwide program conduct a needs assessments, and develop a comprehensive plan to meet the needs of various constituencies in the school. The law prescribes an important role for parents in the schoolwide planning process; parents must *jointly develop* the plan with the school staff.

Advocates must ensure that the schoolwide program planning process is used as an opportunity for entire school communities to engage in substantive dialogue about the needs of low-income students, and determine collectively how to meet those needs. Without efforts to ensure that all constituencies are involved in substantive ways in every stage of planning for schoolwide programs, and that the requirements of the law are adhered to, schoolwide plans will end up being words on paper which have little impact on the direction of the program.

Targeted Assistance

Targeted Assistance Schools provide different challenges to parents, advocates, and schools. These programs, either because the school does not have a high enough population of low-income students to qualify for schoolwide status or because a school chooses not to run a schoolwide program, must use their Title I funds to serve those students who are furthest behind their peers.

While Targeted Assistance Schools may not create the same obvious incentives for broad-based school reform, Congress was clear during the reauthorization that these programs are to be changed, dramatically if necessary, to comply with a series of requirements aimed at ensuring that Title I students in these more "traditional" programs are receiving a high quality education.[9] Students served by Title I programs in these schools must be enabled to meet the state standards. Schools must use effective instructional strategies that help provide accelerated, high-quality curriculum and minimize pulling students out of class. The program must be coordinated with regular programs and taught by high quality professional staff. Further, the school must put into effect strategies for increasing parent involvement, such as the provision of family literacy services.

Through these requirements and others, Congress charged schools with implementing creative strategies for enabling those students who are furthest behind to meet the state standards for all students. This offers schools an opportunity to develop new curricula and pedagogy, design after school and summer programs to supplement students' regular education, and work closely with parents to ensure that they have the tools necessary to participate fully in their children's education. Without the involvement of broad constituencies in the planning and implementing of these programs, they could easily become the stereotypical Title I programs, pulling students out of science, math, language arts, social studies, or other classes daily to teach them a watered-down curriculum in an ineffectual add-on reading or math program.

Parent Involvement

The new law also offers great possibilities in the area of parent

[9] For a complete list of the requirements for Targeted Assistance Schools, *see generally* ESEA, at section 1115; 20 U.S.C. § 6315.

involvement. Each school and each local education agency must have a written parent involvement policy, *jointly developed with and approved by parents*, which, among other things, outlines how parents will be involved in all aspects of the planning and review of Title I programs. The school level policy must include a school-parent compact which outlines how schools, parents, and students will share the responsibility for ensuring student achievement. Parents must also jointly develop the written schoolwide program plan and the local education agency Title I plan.

The term "joint development" should mean that parents sit down as partners with school staff to engage in a serious examination of the needs of Title I students and to discuss the best ways for a school or LEA to ensure that those needs are met. History proves, however, that the interests of parents are often marginalized. Frequently, schools and LEAs expect one or two parents to represent the views of all Title I parents, providing no real opportunity for bringing together broad groups of parents to participate in informed decision-making. Too often, parents are presented with a Title I plan after it has been developed, and told that if they do not approve it, the school or LEA will not get any Title I funds that year.

Key Decisions Are Now Being Made

The new law is effective July 1, 1995. It is critical that parents and their advocates get involved in the important decisions that will shape how this law is implemented from 1995 until 1999, the period of this reauthorization. Many of the decisions about how Title I programs will be shaped for the next five years will be made early on in the reauthorization period as schools, LEAs, and SEAs work to develop their Title I plans, schools and LEAs draft their parent involvement policies, and school communities write their school-parent compacts.

State Title I plans are written only once during the reauthorization period, with amendments made as needed.[10] Thus, ensuring that the plans are of high quality and take into account the needs of all Title I students in the state is critical. At the same time, many states are in the process of making fundamental decisions about how to implement education reform using systems of standards and assessments — decisions which affect Title I.[11] Many of these decisions are long-term, and thus will have an impact on Title I during the entire reauthorization period.

This guide provides information to assist communities in their early efforts to plan for and implement the new law in their schools, communities, and states. It is based in part on the Center for Law and Education's experience in working with communities to improve their Title I programs through the Title I and School Reform Advocacy Project. Other information is drawn from discussions with parents, educators, and advocates around the country, and from the law itself.

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[10] For a full description of state plan requirements, as well as a discussion of the possibility of the consolidation of state plans, *see* section III. A., below.

[11] States which apply for funding under the Goals 2000: Educate America Act, 20 U.S.C. §§ 5801 *et seq.* (Public Law 103-227)(hereinafter Goals 2000), must develop standards and assessments. As of April, 1995, 46 states had received first year Goals 2000 funding. For an explanation of how Goals 2000 funds are used for planning and implementation, *see* section III. A. below.

II. General Information About Title I

(1) What is Title I?

Title I is the largest federal aid program for elementary and secondary schools. Originally known as "Title I" of the Elementary and Secondary Education Act of 1965, it was renamed "Chapter 1" in 1981. In 1988, Chapter 1 was amended by the Hawkins-Stafford Elementary and Secondary School Improvement Amendments of 1988. In 1994, during the reauthorization of the law, Congress reverted back to the program's original name, "Title I."

Title I provides money to school districts around the country based on the number of low-income families in the district. Each school district uses its Title I funds to pay for *extra educational services* for children who are behind in school. Title I's purpose is to help low-income students meet the challenging state standards that have been adopted for all students. If a state does not yet have standards, Title I funds must be used to ensure that Title I students are taught the same knowledge and skills as all other students, not a watered down curriculum.

(2) Which schools receive money?

Each school district is allocated money based on the number of low-income students it serves. For the 1995-96 school year, every school district in the country with at least 10 low-income students receives Title I money. In the 1996-97 school year, however, no school district whose student population is less than 2% low-income students will be eligible for Title I funds. The school district allocates the Title I money to those schools in its district that have the largest percentages of low-income students. The amount of money each school receives is based on the number of low-income students it serves.

(3) Which students benefit from Title I?

Schools which have a high percentage of low-income students can operate "schoolwide programs," in which Title I funds can be used to benefit the entire student population. During the reauthorization of Title I, Congress made it easier for schools to become schoolwide programs. To qualify for schoolwide status, the school must have at least 60% low-income students on July 1, 1995. On July 1, 1996, a school can qualify for schoolwide status if 50% of the students in a school are low-income. Schools operating schoolwide programs can use Title I funds to upgrade the entire educational program in the school.

Other Title I schools, called Targeted Assistance Schools, can only spend their Title I money on their lowest achieving students. Each school community identifies its lowest achieving students and decides how it will spend its Title I money to meet the needs of eligible students.

(4) Who is in charge of developing and implementing Title I programs?

The school district, principals, teachers, and parents all must be involved in developing and implementing the Title I

programs. The state also has a role in helping schools and school districts implement their programs.

(5) How may Title I money be spent?

Under law, Title I money can be spent in an enormous number of ways. The major restrictions are: the money must provide services for low achieving students (in a schoolwide program, services can be provided to all students); the services must be over and above what these students would receive without the program; and the services must adequately raise the achievement level of these students.

Many schools now use their Title I funds to hire special teachers, aides, and tutors to work with Title I children on reading and math outside of the regular classroom. Nevertheless, schools can spend their Title I money in many other ways; these include providing after-school, weekend, or summer school programs; training and support of teachers and staff; and introducing new forms of curriculum and instruction. In addition, Title I funds must pay for the parent involvement program, including the training of parents and support of their activities. Schools with schoolwide projects can also use their Title I funds for overall school improvement or school restructuring efforts.

(6) Do Title I programs need to show results?

Yes. School districts are required to review whether their Title I programs are effective. Schools need to show that their programs are working — that through them, the schools are making "adequate yearly progress" sufficient to enable all Title I students to meet the challenging state standards. If a state does not yet have standards, Title I programs must still succeed in making progress and ensuring that Title I students are learning the same knowledge and skills as all other students. If the programs are not working, schools and districts must improve them. Ultimately, if the programs do not improve, the state or district can impose sanctions against the district or school, such as changing the school staff, withholding funding, or arranging a different structure for supervision of the school.

(7) What is the role of a Title I parent?

Parents must be involved in designing and developing the Title I programs, including jointly developing the Title I plan for the LEA or schoolwide program, judging how well the programs are doing, and figuring out how to improve them, if necessary. They must receive sufficient information and training to become involved. They must be able to make recommendations and receive "timely" responses to their recommendations. In addition, parents must be able to meet with school staff, observe school activities, and receive enough support from schools to be able to work with their children at home.

Each school and district must have a parent involvement policy, jointly developed with and approved by parents, which outlines how parents will be involved in all aspects of the planning, improvement, and review of Title I programs. Additionally, each school must have a school-parent compact, agreed to by parents, which outlines how schools and parents will share the responsibility for ensuring that students meet the state standards.

III. Title I: What the Law Says, and How You Can Get Involved

A. State Level Planning and Advocacy

Much of the "new" federal philosophy about education — articulated by both Congress and the Department of Education — is rooted in state initiated standards-driven reform. Title I is built around a system of state standards and assessments.

States must develop or adopt state standards and assessments, and schools and LEAs must develop programs which will enable their Title I students to meet those standards. If states have standards for all students, those standards must be used for Title I purposes, eliminating the notion that it is permissible to hold Title I students to lower standards than those to which all other students are held.

Many states have already begun the standards setting process using planning funds they have received under the Goals 2000: Educate America Act.[12] Some have undergone an independent, but similar standards setting process. Because Title I is linked so closely to the state standards and assessments, it is vital to understand and be involved in the standards and assessments "movement" in your state.

Goals 2000 and State School Reform

Each state receiving funds under the Goals 2000: Educate America Act is required to develop challenging content and performance standards for what all students should know and be able to do, assessments, and a state plan for the improvement of primary and secondary education. While most states have received Goals 2000 grants,[13] some states have developed their own standards setting process, accomplishing much of what Goals 2000 advocates, but independently of the Goals 2000 legislation.

State standards and assessments developed under Goals 2000 or otherwise will be the standards for *all* students, including students eligible for Title I. Thus, it is important that the standards be high quality and that the assessments enable all children to demonstrate what they know.

Goals 2000 legislation requires that states provide for broad public participation in the planning process; specifically, states are required to have parents and community representatives on a state panel which will develop the plan for improving primary and secondary education in the state.[14] States are also required to hold public hearings on the nature of the standards being developed and the state and local responsibilities for

[12] 20 U.S.C. §§ 5801 *et seq.*; Public Law 103-227 (hereinafter Goals 2000).

[13] As of April, 1995, 46 States had received Goals 2000 planning grants.

[14] 20 U.S.C. § 5886(b)(1); Goals 2000, at section 306(b)(1).

helping all students achieve the standards. The state is required to conduct an outreach effort to ensure that representatives of diverse populations in the state, including students of limited-English proficiency and those with disabilities, have an opportunity to participate in the process.[15]

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[15] 20 U.S.C. § 5886(b)(5); Goals 2000, at section 306(b)(5).

WHAT TO DO

State Level Planning and Advocacy

★ Find out from your state Department of Education where your state is in the Goals 2000 process. Most states which have applied for Goals 2000 money have received planning grants — money to use to develop a plan for improving K-12 education in the state, which meets all of the requirements of the Act. After the first year, upon development of the state improvement plan, the state applies for implementation funds, money to carry out the plan.

If your state is in the planning stage, find out when the public hearings are, and ensure that people representing the interests of low-income students and parents speak on the merits and problems of what the state is planning. Make sure that the state is reaching out to *all* constituencies. If your state is developing standards and assessments and a plan for improving education under Goals 2000, find out how they are undertaking such development and how they are ensuring that diverse constituencies in the state are represented in that process.

★ If your state has not received a Goals 2000 grant from the Department of Education to start the process of setting standards, developing assessments, and planning for the improvement of elementary and secondary schools, determine why they have not started the process, and urge them to do so. If your state does not plan to apply for a Goals 2000 grant, find out if standards and assessments are being developed independently and whether the state is developing its own school reform plan. Work to ensure that any panel developing such standards and assessments includes representatives of students with diverse needs.

★ Whether or not your state has received Goals 2000 money, it may have enacted state school reform legislation, or have regulations or policies which address school reform. Such laws or policies will outline in greater detail what reform strategies your state is undertaking, the goals of such reform, how the public must be involved in reform efforts, and the method the State will use to determine whether schools are implementing good educational programs. Find out what state laws or policies exist and make sure that varied constituencies understand what the laws say and how to implement and enforce them.

★ If your state has already adopted standards and assessments, work with your school district and schools to ensure that parents understand the standards and assessments and the purposes for which they will be used.

State Title I Plan[16]

Title I requires that each SEA develop a state plan in consultation with parents and submit it to the U.S. Secretary of Education.[17] The plan must demonstrate that Title I is coordinated with Goals 2000 and other acts, and:

- Demonstrate that the state has developed or adopted challenging content and performance standards or has a schedule to develop them in at least reading/language arts and math by 1997-1998.[18] If a state has developed or adopted standards for *all* students in the state through Goals 2000 or another process, those standards *must* be used, modified as necessary to comply with the law, for Title I purposes. If a state does not yet have its standards, it must describe a strategy for ensuring that Title I students are taught the same knowledge and skills and held to the same expectations as all other students.

- Demonstrate that the state has developed or adopted high quality assessments or has a schedule to develop them by 2000-2001. The same assessments must be used to measure the performance of all students, if the state measures the performance of all students. Assessments must be valid and reliable, aligned with the state's content and performance standards, involve multiple up-to-date measures of student performance, and provide for the participation of all students, the reasonable adaptation for students with diverse learning needs, and the inclusion of LEP students, who shall be assessed, to the extent practicable, in the language most likely to yield reliable information. Assessment results must be able to be disaggregated within each school, LEA, and state, by: gender; major racial and ethnic group; LEP, migrant, and disability status; and economic disadvantage.

- Define "adequate yearly progress." The state will use this definition to determine if schools and LEAs are satisfactorily progressing towards enabling all students to meet the state performance standards. Adequate yearly progress must be defined "in a manner that is consistent with guidelines established by the Secretary that result in continuous and substantial yearly improvement of each local educational agency and school *sufficient to achieve the goal* of all children served under this part meeting the state's proficient and advanced levels of performance, particularly economically disadvantaged and limited English proficient children." (emphasis added). The definition must link progress primarily to performance on the state assessments, but may be defined using other measures. For example, states might choose to factor in schools' dropout or retention rates when considering whether schools are making adequate yearly progress.

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[16] For a description of the state plan requirements, *see generally* Elementary and Secondary Education Act, as amended by Improving America's Schools Act of 1994 (hereinafter ESEA), at section 1111; 20 U.S.C. § 6311.

[17] If your state is including Title I in a consolidated plan, *see* the section on consolidated plans, below.

[18] Content standards define what all children should know and be able to do. Performance standards define levels of performance which indicate how well students have mastered the material, including "advanced," "proficient," and a third level, "partially proficient," which will be used "to provide complete information about the progress of the lower performing children toward achieving the proficient and advanced levels of performance."

- Propose a transitional system of yearly statewide assessments that will assess the performance of complex skills and challenging subject matter, if the state has not developed assessments. If it uses a system of transitional assessments, a state must also devise a method of identifying schools and LEAs for program improvement or corrective action.[19]

- Describe how the state will help LEAs and schools develop the capacity to comply with Title I.

- Describe other factors the state deems important, such as Opportunity to Learn standards, or other strategies developed in its Goals 2000 plan.

- Provide assurances that the state will:

  * implement a system of school support teams;

  * work with other agencies to provide technical assistance to LEAs and schools;

  * notify LEAs and the public of the standards and assessments, the authority to initiate schoolwide projects, and the LEA's responsibilities for school improvement and corrective action;

  * provide the least burdensome regulations for LEAs and schools operating Title I programs;

  * use a Committee of Practitioners to help develop the plan, and monitor its implementation;

  * coordinate Title I programs with school-to-work, vocational education, cooperative education, mentoring, and apprenticeship programs.

Who must be involved in developing the state plan: the state, in consultation with LEAs, teachers, pupil services personnel, administrators, other staff, and parents.

Consolidated State Plans

On January 13, 1995, the Department of Education proposed guidelines which would allow states to submit one consolidated plan for thirteen federal education programs. The plan would

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[19] Upon full implementation of all aspects of the law, decisions about school or LEA improvement, (reevaluation of what is and what is not working, the provision of extra assistance from the LEA or state, and ultimately the development of an improvement plan) and corrective action (sanctions such as hiring a new staff or withholding funding) are based on whether a school or LEA is making adequate yearly progress toward enabling all of its Title I students to meet the state standards. Adequate yearly progress is based largely on student results on the state assessments. However, until a state has its permanent assessments in place, it must still have a way to identify schools and LEAs for improvement and corrective action, based on whether they are making progress toward enabling all students to meet the state standards. (*See* ESEA at section 1111(b)(7); 20 U.S.C. § 6311(b)(7)). The scheme is further complicated if a state does not yet have standards. Even then, it must have a way of determining whether schools are enabling their students to make real gains on whatever assessment they are using. Making one NCE (Normal Curve Equivalent) gain on a norm-referenced test, often defined as progress under the 1988 law, is never going to enable Title I students to "catch up," and, thus, should not be defined as progress. If a state has no standards in place, progress should be defined as making substantial gains sufficient to achieve the goal of enabling all students to perform the skills measured by the assessment the state is using prior to having a permanent set of standards and assessments in place.

explain how all of the Federal resources would work together to promote the state's education goals.[20] The Department proposed guidelines for preliminary consolidated plans (1995-96) and for final plans (1996-1999).

Many states have indicated that they are likely to file consolidated plans. Because of the Department of Education's interpretation of the consolidated plan option, at the time of publication of this guide, it was unclear exactly what implications consolidated state planning will have on the specific planning requirements of Title I. What is clear, however, is that Title I programs in the 1995-96 school year must comply with the new law, and states — even if they are planning for Title I as part of a consolidated plan — must develop those elements which are required to operate a program which is in compliance.

It is vital that parents and their advocates play a major role in the development of state consolidated plans, so that key components of the planning sections of those programs covered by the proposal are not lost in the consolidation, and that states consider throughout the consolidated planning process how they will meet the requirements of Title I.[21]

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[20] 60 Federal Register 3306 (January 13, 1995).

[21] In addition to allowing consolidated planning, the new law also permits SEAs to seek waivers from provisions of Title I. Waivers, if granted, exempt SEAs from having to comply with the provisions they have asked to have waived. SEAs apply for waivers directly from the U.S. Secretary of Education. It is extremely important for parents and advocates to be involved in the decision to seek waivers and in monitoring what impact a waiver, if granted, has on the Title I program.

WHAT TO DO:

State Title I Plan

★ Find out from your state department of education how the state is developing its Title I plan. Make sure that a diverse group of parents is involved throughout the process of developing the plan.

★ If your state is submitting a consolidated plan, find out how the state department of education will involve the public in the process of developing a consolidated plan.

Preliminary Consolidated Plan: The criteria proposed by the U.S. Department of Education stated that, at a minimum, each state must provide an opportunity for public comment prior to submitting its year one (FY95) preliminary consolidated plan to the U.S. Department of Education. If your state has hearings to seek input on the plan, ensure that people representing the interests of low-income students and parents are present to speak at the hearings. If it does not hold hearings, but provides another mechanism for public comment, ensure that low-income parents and their advocates are commenting on the impact the consolidated state plan will have on the specific planning and public participation requirements of Title I. Remember that the state's Title I program must be in compliance with the law in 1995-96, even though it is not required to go through a separate state planning process for Title I. If there are problems with the preliminary consolidated plans, continue to point that out to the state department of education, and work to improve the preliminary plan as well as ensure that the final plan addresses your concerns.

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WHAT TO DO - State Title I Plan *(continued)*

Final Consolidated Plan: Broad constituencies, including parents, must be included throughout the process of developing the final consolidated plan, which will be submitted to the Department of Education in 1996. Push your state to have informed, meaningful, broad-based parent involvement in all aspects of drafting the state plan. This should include: effective methods for reaching diverse parents; ongoing and in-depth consultation throughout the plan's development; and informed participation on the part of parents. Contact your state Department of Education and make sure that parents are represented on the state consolidated planning committee, and work to ensure that parents are involved fully throughout the process.

★ If your state is submitting a consolidated plan, work to ensure that it is still adhering to the planning requirements of other laws. While under the consolidated state plan proposal, states will no longer have to submit a separate Title I plan to the Department of Education, nothing prevents them from drafting a Title I plan for state purposes. Talk to state officials about how they plan to ensure that Title I requirements are adhered to if they do not have a state Title I plan. Encourage them to develop a plan consistent with the Title I requirements outlined above, which will make clear to LEAs, schools, administrators, teachers, and parents in the state how the program will work statewide, how the progress of schools and LEAs will be measured, and what support the state will provide to schools and LEAs.

★ If your state does not yet have standards, make sure that the state plan outlines clearly how it will ensure that Title I students are taught the same knowledge and skills and held to the same expectations as all other students.

★ Find out what criteria your state and LEA are using to assess the progress of LEAs and schools, respectively, if the state is using a transitional assessment system. The state should outline such a process in the state plan. Talk to your state education department to ensure that the process of identifying schools and LEAs is clear, and includes a determination of whether schools and LEAs are ensuring that Title I students are learning the same knowledge and skills as all other students.

★ Monitor your state's development of a definition of "adequate yearly progress." Work with the parents who are involved in developing the state plan to ensure that the state's definition of adequate yearly progress is rigorous enough to ensure that schools will enable all Title I children to meet the state standards. Progress should not be defined as any improvement, no matter how small. The law requires that the progress be sufficient to achieve the goal of *all* students meeting the standards.

B. Local Educational Agency (LEA) Planning and Advocacy[22]

Each LEA must submit a plan to the State Educational Agency (SEA) which includes:

- A description of poverty criteria that the LEA will use to determine which schools receive Title I funds. An LEA may use poverty figures from recent census data, children receiving AFDC benefits, free or reduced lunch, or Medicaid, or the LEA may use a composite of these criteria.

- A description of how teachers in Targeted Assistance Schools[23] — in consultation with parents, administrators, and pupil services personnel — will identify those children most in need of Title I services.

- A description of any assessments that the LEA wishes to use in addition to the state assessments. Local assessments will be used to: determine the success of students served under Title I in meeting the state standards; assist in diagnosis, teaching, and learning in the classroom; and determine what revisions are needed in programs so that Title I students are able to meet the challenging state standards. This is critical because many of the requirements of the new law — such as reporting student progress toward meeting the state performance standards to parents — will be difficult for districts and schools to meet without the use of annual local assessments. The law mandates that state assessments be given three times during a student's career; without the use of additional local assessments, charting students' annual progress toward meeting the standards — and adapting the curriculum as necessary — would be close to impossible.

- A description of indicators, in addition to the assessments, which will be used for purposes such as diagnosis, revising curricula, and improving teaching.

- A plan for the ongoing professional development of teachers, administrators, and where appropriate, pupil services personnel and parents. Staff development must "support instructional practices that are geared to challenging state content standards and create a school environment conducive to high achievement in the academic subjects."[24] Professional development activities must also include

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[22] For the requirements for Local Educational Agencies, *see generally* Elementary and Secondary Education Act, as amended by Improving America's Schools Act of 1994 (hereinafter ESEA), at section 1112; 20 U.S.C. 6312. It is important to note that those states which submit and get approval of consolidated state plans may require local educational agencies to submit a consolidated plan for those programs the state has chosen to include in its consolidated plan. Careful monitoring at the local level is imperative to ensure that important provisions are not lost in the consolidation. Additionally, LEAs who wish to seek waivers from provisions of the new law may do so either through the SEA or directly to the U.S. Secretary of Education. If waivers are granted, they exempt LEAs from having to comply with the provisions of law they have asked to have waived. It is extremely important for parents and advocates to be involved in the decision to seek waivers and in monitoring what impact a waiver, if granted, has on the Title I program.

[23] Targeted Assistance Schools are those which target their Title I fund specifically to serve certain eligible students. For an in-depth discussion of the requirements for Targeted Assistance Schools, see section III.C.2., below.

[24] ESEA at section 1119(b)(1)(A); 20 U.S.C. § 6320(b)(1)(A).

strategies for teaching children with special needs and eliminating gender and racial bias, be developed with the extensive participation of teachers, and, where appropriate, include strategies for developing teaching methods and curricula that integrate academic and vocational instruction. Parents may participate in professional development activities if the school determines that parental participation is appropriate.

- A description of how the LEA will coordinate and integrate the Title I program with other programs — such as Head Start, Even Start, School-to-Work[25], vocational education — and services for migrant students, LEP students, and students with disabilities.

- A description of programs the LEA will conduct for children living in institutions or attending community day school programs for neglected or delinquent youth, and homeless children.

- A parent involvement policy, developed jointly with, agreed to, and distributed to all Title I parents.[26]

- Assurances that the LEA will:

  * inform parents and schools of schoolwide program eligibility.

  * provide technical assistance to schoolwide programs to assist them in developing comprehensive programs to enable all students to meet the state standards.

  * work with schools as they develop plans for schoolwide and targeted assistance programs.

  * invoke school improvement and corrective action when necessary.

  * collaborate with health and social services agencies.

  * provide services to eligible private school students.

  * examine model programs for educationally disadvantaged students and research which indicates that services may be most effective if focused on students in the earliest grades at Title I eligible schools.

  * work with LEAs who choose to spend Title I dollars on early childhood programs, an option available beginning in 1997.

Who must be involved: The LEA, including teachers (the law specifically says that vocational teachers must be included) and pupil services personnel, where appropriate, must *jointly develop* the LEA plan with parents of children in schools served under Title I. Additionally, parents must *agree* to the parent involvement policy.[27]

WHAT TO DO: (see next page)

[25]For a full description of the School to Work Opportunities Act, see *The School to Work Opportunities Act of 1994: A Guide to the Law and How to Use It* by Lauren Jacobs, published by the Center for Law and Education (1995).

[26] For a full description of parent involvement provisions of the Act, see section III.D., below.

[27] For a full discussion of what joint development should entail, see section III.D., below.

WHAT TO DO

Local Educational Agency Planning and Advocacy

Find out about the LEA's 1994-95 Chapter 1 program:

★ Examine the school district's and school's 1994-95 Chapter 1 plan. There are some general inquiries you can make about the effectiveness of your LEA's or school's 1994-95 Chapter 1 program, which will serve three purposes.

* First, it is important to know whether the school has been complying with the law.

* Second, understanding how the current program is structured and what the barriers to success have been will enable you to determine how to work with the school in implementing the new law. If, for example, the school system has made only feeble attempts to "consult with" parents in drafting a parent involvement policy (as is required by the 1988 law) it might be assumed that it will be more reluctant to "jointly develop" the LEA's Title I plan, as required under the new law.

* Knowing the history of your LEA's or school's Title I program will help you plan your strategy for working with the LEA and school more effectively. Finally, although the new law is effective July 1, 1995, States are not required to have their permanent system of standards and assessments in place until the 2000-2001 school year. Thus, unless you live in a State which is a leader in the standards and assessments development process, an immediate and complete shift to the structure outlined in the new law will be difficult. For example, until a State has standards and assessments in place, determining whether schools and LEAs are making adequate yearly progress toward enabling all students to meet those standards, as measured by performance on the assessments, is impossible. However, LEAs and schools are still required to plan and execute their Title I programs as outlined in the new law. And, States are still required to determine if the schools and LEAs are running effective programs which enable students to make progress.

Understanding the effectiveness of the 1994-95 program will provide the background you need to make sure that as schools and LEAs shift to the structure outlined in the new law, they are not conducting a Title I program with a watered down curriculum, low expectations for participating students, and minimal progress for children in the program.

★ Ask the school district for a copy of its 1994-95 Chapter 1 application. This document should include a list of those schools in the district eligible to receive funds, descriptions of the Chapter 1 programs in eligible schools, as well as the desired outcomes for the program, a copy of curriculum goals and achievement standards in each subject area for each grade level, evaluation methods, and the parent involvement policy. Make the following determinations based on the information you get from the school district.

1. Are the desired outcomes written, as required by the 1988 law, in terms of the "basic and more advanced skills that *all* children are expected to master"? (emphasis added). According to the law, advanced skills include "reasoning, analysis, interpretation, problem-solving,

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WHAT TO DO: Local Educational Agency Planning and Advocacy *(continued)*

and decision-making as they relate to the particular subjects in which instruction is provided" in the Chapter 1 program.

2. Compare the desired outcomes for Chapter 1 to any existing State standards outside of Chapter 1 and to the local curriculum goals and achievement standards in each subject area for each grade level. Are they the same, or are the Chapter 1 desired outcomes a diluted version of the State standards and/or local curriculum goals and achievement standards? Under the 1988 law, the desired outcomes for Chapter 1 students should be the same as the desired outcomes for *all* students in the school district. Under the new law, if the State has developed or adopted standards for *all* students through Goals 2000 or another process, those standards are the standards for Title I students as well.

3. Look at the description of the Chapter 1 program. Does the program described enable students to learn the basic *and* advanced skills that all students are expected to master? If the school is a targeted assistance school, is it clear that students' Chapter 1 classes and non-Chapter 1 classes complement each other? Does the plan outline how teachers will work together to ensure that all of a student's needs are met? Is the focus of the program just reading or math, or does it enable students to learn in all of the core content areas?

4. Examine the parent involvement policy. Does it spell out when and where the annual meeting will take place, and how parents will be informed of the meeting? Does it detail *how* parents will be involved throughout the design and implementation processes? Does it articulate what workshops and other opportunities will be provided to parents, to enable them to participate fully in their children's education? Is the policy quite specific, or does it merely repeat the legal requirements, without addressing how those requirements will be met?

★ Talk to parents, school district and school personnel, students, and education advocates in the community to determine the effectiveness of the 1994-95 Chapter 1 program.

Using all of this information, try to determine what is working and what needs to be changed as the school district, schools, and parents begin the planning process for implementing the new Title I. Are schools involving parents in important decisions about their children's education? Are schools providing programs which will help *all* students achieve? Find out who else in the community has been working to improve the quality of the Chapter 1 program. Consider meeting with them to discuss common concerns and strategies for improving the program.

Get involved in developing the LEA's new Title I program:

★ The law requires that the LEA *jointly develop* the LEA Title I plan with parents. Thus, before any planning takes place, parents should negotiate the LEA parent involvement policy which outlines how they will jointly develop the LEA Title I plan with the district. If your district is in the midst of the

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WHAT TO DO

Local Educational Agency Planning and Advocacy *(continued)*

planning process and has not included parents, call the district Title I coordinator, explain that the law requires that parents jointly develop the Title I plan, and ask that parents representing diverse students with wide-ranging needs be included. Work to ensure that *joint development* means that parents and school officials sit down to examine carefully the needs of students in the district and to plan a Title I program which will meet those needs.

Parents must be involved in informed, shared decision-making in all aspects of the planning for and reviewing of the Title I program. This involvement must go beyond participation in the planning of parent involvement activities. For example, parents should be involved in joint decision-making regarding which schools operate schoolwide programs, whether the LEA will seek waivers from provisions of the Act from the Department of Education, and how schools will provide information about individual student achievement to parents in a useful and timely way.

While the new law very clearly emphasizes parent involvement, it is imperative that such involvement be integrally linked to the other core parts of the Act.

C. School Level Planning and Advocacy

The new law places great emphasis on school-based decision-making by giving more authority to Title I schools than they have had in the past. Thus, it is important that while parents are involved at the state and district levels, they remain integrally involved at the school level.

There are two kinds of schools under Title I: those that run schoolwide programs, in which Title I funds can be used to improve the entire educational program for all students; and those that are designated "targeted assistance schools," and must specifically target Title I services to eligible students. The planning process for the two is different.

1. Schoolwide Programs[28]

The new law attempts to provide a stimulus to schools to institute broad educational reform by making it easier for schools to meet the threshold for initiating schoolwide programs. In the past, those schools with a density of at least 75% low-income students were eligible for schoolwide status. Under the new law, those schools which have at least 60% low-income students on July 1, 1995 (and at least 50% on July 1, 1996), are eligible.

The philosophy behind schoolwide programs is basic: when a large number of students are in need, the best way to upgrade the educational experience for those students is to improve the program for the entire student body. Many practitioners have argued that schoolwide programs are the most effective Title I programs, as they require schools to examine all of the needs of the students in the school, and use Title I funds to help meet those needs in a comprehensive way.[29]

In reality, though, money in schoolwide programs has often been used as general aid to continue existing ineffective programs, instead of facilitating broader reform of the entire school program, as intended. The new law includes requirements for schoolwide programs designed to ensure that schools have a complete vision of the high quality educational program Title I funds will help support.

Schools which operate schoolwide programs must conduct a comprehensive needs assessment of the entire school based on the performance of students in relation to the state content and performance standards. They must also develop a plan that articulates how the school will:

- Meet the needs of all students using various reform strategies, including, but not limited to, integrating vocational and academic learning, using strategies to address the needs of historically underserved populations, increasing the amount and quality of learning time, providing counseling, mentoring, college and career awareness, and personal finance education programs.

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[28] For the requirements for schoolwide programs, *see generally* Elementary and Secondary Education Act, as amended by Improving America's Schools Act of 1994, (hereinafter ESEA) at section 1114; 20 U.S.C. § 6314.

[29] Indeed, in its pre-reauthorization report *Making Schools Work for Children in Poverty*, the Commission on Chapter 1 recommended to Congress that all Chapter 1 programs be schoolwide.

• Have both a short-term strategy for immediate individual assistance for those students having trouble mastering specific skills or concepts, and a long-term strategy planned with the student's parents for a child who is having trouble achieving the state's standards.

• Determine if the needs of all students will be met.

• Provide instruction by a highly qualified professional staff. Professional development for teachers and aides, and where appropriate, pupil services personnel, parents, principals, and other staff must also be provided.[30]

• Use all available resources to implement the program.

• Include a list of SEA, LEA, and other federal programs which will be included in the schoolwide program.

• Provide individual student assessment results, including an interpretation of the results, to parents of each child assessed.

• Disaggregate the assessment results of students, by gender, major ethnic or racial group, LEP or disability status, migrant status, or economic disadvantage.

Who must be involved: Teachers, principals, other staff, and, where appropriate, pupil services personnel must *jointly develop* the plan with parents. If the plan is for a secondary school, students must be involved in the planning process.

[30] Throughout Title I, Congress emphasized the importance of professional development to the success of Title I programs. Pub. L. 103-382, Section 1119 (20 U.S.C. § 6320) specifically addresses professional development requirements, (*see* Appendix), as does Title II (Dwight D. Eisenhower Professional Development Program).

WHAT TO DO

Schoolwide Programs

★ Find out from your school district if your school is eligible for schoolwide status under the new law, and whether it will initiate a schoolwide program. Make sure that, as required by law, parents are involved in the decision whether or not to seek schoolwide status. Work to ensure that all parents are given an opportunity to participate in this decision. If parents in your school have elected parent representatives, work with them to ensure that broad groups of parents are able to provide input into the decision-making process.

★ If the school is eligible for schoolwide status, but has not invoked it, consider whether to encourage them to do so, as it can be an important tool for improving the entire school.

★ Ensure that school officials are engaging parents in joint development of all parts of the plan. For example, parents should be involved in designing and conducting the required comprehensive needs assessment.

★ Encourage the school community to seek input about the effectiveness of new teaching strategies and curricula. Consider inviting speakers to meet with the group planning the Title I program to discuss the newest research on smaller classes or schools within schools, new pedagogy, alternative assessment, the standards movement in your State, or other issues of particular importance to your school community. Discuss with the group what strategies would work best in the school, and advocate the use of those strategies in the schoolwide program.

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WHAT TO DO: Schoolwide Programs *(continued)*

★ Make sure that the schoolwide program plan includes a description of how the school will provide individual assistance to those students who are having trouble mastering specific concepts, and those students who are having difficulty meeting the standards. This should include describing how schools will identify students who need such assistance, as well as describing the staff development needed to ensure that teachers have the skills to provide such assistance.

★ If your school is given the authority to waive provisions of other laws in order to run a schoolwide program, make sure that it does not exempt itself from key provisions of the Perkins Act, the Bilingual Education Act, School-to-Work Opportunities Act, or other laws which do not get in the way of a school's initiating a schoolwide program. The "Special Rule" was adopted by Congress to permit schools operating schoolwide programs to combine funds to meet the requirements of each of the laws in a coordinated way, not to ignore those requirements.

Legislative history is clear that Congress did not intend to exempt schools operating schoolwide programs from all of the requirements of other laws. While schools do not have to operate under the special rule, a portion will choose to do so. Close monitoring is imperative to ensure that schools which choose to combine funds are, in fact, meeting the needs of *all* children.

2. Targeted Assistance Schools[31]

Targeted Assistance Schools are those schools which do not qualify for schoolwide status, or which choose not to invoke it but still receive Title I funding. Title I funds in these schools are used to serve those students deemed "failing, or most at risk of failing, to meet the state's challenging student performance standards on the basis of multiple, educational related, objective criteria."

The more "traditional" model of Title I programs, Targeted Assistance Schools' programs have too often consisted of watered-down curricula in pull-out programs which virtually never enable students who are "behind" to "catch up" to their peers. The new provisions for Targeted Assistance Schools are designed to change that.

While the legislation does not articulate guidelines for the planning process for Targeted Assistance Schools,[32] it does outline the required components of a Targeted Assistance School's Title I program. The law requires that these programs provide a high quality education for those students deemed eligible. These programs must:

- use Title I resources to enable participating students to meet the state standards;
- be based on effective means for improving students' achievement;

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[31] For the requirements for Targeted Assistance Schools, *see generally* ESEA, at section 1115; 20 U.S.C. § 6315.

[32] The law does, however, make very specific requirements about parent involvement in *all* Title I programs, including Targeted Assistance Schools. *See generally* ESEA, at section 1118; 20 U.S.C. § 6319. These requirements are discussed in-depth in section III.D., below.

• ensure that planning for Title I students is incorporated into other school planning;

• provide instruction by a highly qualified, professional staff;

• use effective instructional strategies that provide an accelerated, high-quality curriculum, minimize pulling Title I students out of their regular classes, and are coordinated with and supportive of the students' regular curriculum.

Who must be involved:

The law does not list all parties who must be involved in this process or explicitly require that the TAS have a written Title I plan. However, parental involvement provisions of the law require that parents be involved in the process of planning, review, and implementation of the Title I program in Targeted Assistance Schools, and there are important ways in which parents and advocates can help shape the program.

WHAT TO DO
Targeted Assistance Schools

★ Before any planning takes place, make sure that the school and parents have jointly developed and agreed to a parent involvement policy. The policy should outline how the school will involve parents in all aspects of the planning and review of the Title I program, as required by law.

★ Work to ensure that your Targeted Assistance School has a Title I plan *agreed to by parents*. This agreement can be negotiated in the school's parent involvement policy.

A plan agreed to by the entire school community will enable everyone to understand and buy into the program's goals and will articulate to the community how the program will, as required by law, enable students to meet the State standards.

Furthermore, the parent involvement provisions of the new law require parental involvement in the planning and review of the program. Enabling parents and school personnel to sit down, think through, and grapple with how the program will meet the needs of the students, and to articulate that vision in a written plan, is an important step in assuring that parents' voices are heard in planning the education of their children.

★ Even if your school will not develop a written plan, parents *must* be involved in the Title I planning process. Make sure that the parent involvement policy, to which parents much agree, outlines *how* parents will be involved in the planning process, and that school officials are committed to ensuring parental involvement. Anything less than informed, face to face discussions and decision-making will not meet the legal requirement that schools "involve parents, in an organized, ongoing, and timely way, in the planning, review, and improvement of [Title I] programs."[33]

[33] ESEA, at section 1118(c)(3); 20 U.S.C. §6319(c)(3).

D. Parent Involvement Policies[34]

1. Local Educational Agency Parent Involvement Policy

Under the new Title I, each local educational agency must have a parent involvement policy, *jointly developed with, approved by*, and distributed to parents. This policy must outline how the LEA will:

- Involve parents in the joint development of the LEA Title I plan.
- Build parents' capacity for involvement. Parents must have the tools they need in order to participate fully in decisions regarding their children's education.
- Coordinate strategies with parents in other programs, such as Even Start and Head Start.
- Conduct annual evaluations of the effectiveness of parent involvement.
- Use the results of the annual evaluations in designing strategies for school improvement, and revising the parent involvement policy as needed.

Additionally, each school district receiving over $500,000 of Title I funds must spend at least 1% of that money to facilitate parent involvement. This money can be used for a wide-range of activities and services necessary to enable parents to participate fully in decisions about their children's education (for example, training, materials, or childcare during parent meetings). School districts which receive less than $500,000 in Title I money are still responsible for building the capacity of parents to participate fully in Title I planning, review, and improvement.

Experience under the 1988 law is that "approval" is sometimes interpreted by school districts as requiring a signature on a form, proving that parents have "approved" something. In fact, joint development and approval should mean something far more. Parents must be informed about the issues. They should be in a position to assess what they need in order to be full participants in their children's education, and should be full partners in determining how the money set aside for parent involvement can facilitate that full participation. Parents should be involved in ongoing discussions about planning, implementing, reviewing, and improving Title I programs.

WHAT TO DO: (see next page)

[34] For the requirements for parent involvement policies, *see* ESEA, at section 1118; 20 U.S.C. § 6319.

WHAT TO DO
LEA Parent Involvement Policy

★ Get a copy of your district's 1994-95 parent involvement policy. Under the 1988 law, each district receiving funds must have a written parent involvement policy, developed in consultation with parents, which allows for an annual meeting about the program, access to information about their children's progress, and, to the extent practical, parent-teacher conferences to discuss their children's progress. Determine if the district policy meets these basic requirements. This determination is important background as you work to develop the parent involvement policy under the new law.

★ Talk to parents to determine if the parent involvement policy is effective, and whether parents were involved in drafting it. Work with a group of parents to decide how a parent involvement policy could be a stronger tool for improving the quality of the district Title I program, and determine how to use the stronger language in the law - that the policy be "jointly developed with" and "approved by" parents - to ensure a voice for parents. For example, the written policy should ensure parents will have approval over the LEA's Title I plan, and over the expenditure of the 1% of Title I funds that the LEA must spend to facilitate parent involvement.

The policy must also outline how parents will receive training on topics parents deem necessary to participate fully in the Title I planning, review, and implementation processes, and the provision of other services which will facilitate parental involvement (childcare, transportation, flexible meetings, etc.) . These expenses can be paid for by the 1% of Title I funds that districts must spend to facilitate parent involvement. If your district receives less than $500,000, the LEA and school must still work to build the capacity of parents to be fully involved by providing materials, literacy training, assistance in understanding the National Education Goals, and other related topics necessary for parents full involvement.

The policy should be as specific as possible. A policy which only repeats the law's requirements without spelling out *how* an LEA will meet the requirement is inadequate. For example, the parent involvement policy should articulate *how* parents will be assured adequate and meaningful involvement, including a schedule of meetings and trainings, an outline of the approval process of the Title I plan and expenditure of funds to facilitate parent involvement, and a discussion of how other parent involvement requirements of the law will be met.

2. School Parent Involvement Policy and School-Parent Compact

The new law requires each school receiving Title I funds to have a parent involvement policy as part of its Title I plan. This policy must be *developed jointly with, approved by*, and distributed to parents, and must include a description of how the school will:

- convene an initial annual meeting for parents. All Title I parents must be invited to the annual meeting, which must be held at a convenient time. At this meeting, parents must be told about Title I, the school's participation in the Title I program, and parents' rights to be involved in the Title I program.

- offer flexible meetings for parents throughout the school year. Such meetings should include time to share experiences, brainstorm about creative programs to involve parents, and participate in decisions about the education of their children.

- involve parents in planning, review, and improvement of the program.

- give parents timely information about the program, including a description of the school curriculum and the assessments used to measure student progress.

- implement a school-parent compact, which outlines how schools, parents, and students will share responsibility for ensuring student achievement. This compact must:

  * describe the school's responsibility to provide high quality curriculum and instruction in a supportive and effective learning environment that enables children to meet the challenging state standards.

  * describe ways in which parents will be responsible for supporting their children's learning.

  * address the importance of communication between parents and schools, through conferences, regular reports, and reasonable access to staff and classrooms.

- build capacity to ensure the effective involvement of parents. Each school and each district must provide assistance to parents in helping them understand the goals, standards, and assessments, as well as the new Title I law and how to help their children.

Schools and districts are to provide training and materials and must coordinate with other programs, such as literacy training programs, in order to assist parents in helping their children at home. Importantly, schools must also educate teachers, principals, and other staff in how to work well with parents.

If the school has a parental involvement policy for all parents, it may be amended to meet the requirements of Title I.

Who must be involved: School staff and parents of participating children must jointly develop the policy, and parents must agree to it.

WHAT TO DO

School Parent Involvement Policy and School-Parent Compact

Find out if your school already has a parent involvement policy. If it does, get a copy of it, and talk to parents to determine if it is effective in ensuring that parents are involved in a meaningful, ongoing way in the decision-making for Title I programs. If it is not effective, or does not meet the meet the legal requirements under the new Title I law,

(continued on next page)

WHAT TO DO

School Parent Involvement Policy and School-Parent Compact *(continued)*

or if there is no policy in place, work with a group of parents to determine how to develop a strong parent involvement policy.

Suggestions include:

- Ensuring that parents have approval of the schoolwide program Title I plan, and approval of decisions made about how to plan and carry out Title I programs in Targeted Assistance Schools.
- Planning meetings at flexible times so that the maximum number of parents can be involved.
- Making sure that childcare and transportation are provided for parents, if necessary. These expenses can be paid for by the 1% of Title I funds that districts must spend to facilitate parent involvement.
- Holding periodic, scheduled meetings at the school with teachers, administrators, and other school staff, to discuss the Title I curriculum, standards and assessments, or innovative strategies the school is using to improve student learning.
- Determining what training parents think is necessary to enable them to participate fully in their children's education, and planning for those sessions.
- Ensuring that, as required by law, limited English proficient and disabled parents are given information in a language and form they understand.
- Ensuring that limited literacy parents are given the information and assistance they need to participate fully in their children's education.
- Finding out how to get involved in drafting the school-parent compact. Make sure both that the school knows how important this process is, and that many different parents are involved in the process.

Work to ensure that:

* Parents are *equal* partners in developing the compact. This should include having at least as many parents as school personnel "at the table" negotiating the compact, as well as ensuring that the parents have all of the information they need to participate in informed, shared decision-making. As part of the parent involvement policy, parents must also *approve* the school-parent compact.

* The compact outlines exactly how the school will provide a "supportive and effective" environment for all students.

* The compact defines "reasonable access" to staff and classrooms to observe activities in a way that allows parents ample opportunities to visit their child's school, observe different classes, and talk with teachers and school staff in order to make informed decisions about their child's education.

* The compact provides all parents a guarantee from the school that they will receive all of the information they need in order to make decisions about their children's education.

* The compact meets the specific needs of the Title I students at your school. Each compact should be different, allowing each school to identify what is important to its school community. School districts should be discouraged from using "cookie cutter" compacts for each school, precluding the real negotiation necessary to make a compact effective.

Like the LEA parent involvement policy, the school level parent involvement policy should be as specific as possible. It should articulate *how* parents will be assured adequate and meaningful involvement, including a schedule of meetings and trainings, and an outline of how other parent involvement requirements of the law will be met.

E. Oversight Procedures Under Title I[35]

The new law sets up an internal system of oversight for State Educational Agencies (SEAs) and Local Educational Agencies (LEAs). In addition, stronger parent involvement provisions will enable parents to monitor programs closely on a more informal basis.

1. State Educational Agency

States have three primary roles in overseeing Title I programs. First, SEAs must determine whether LEAs are making progress toward enabling all students served by Title I within the LEA to meet the state performance standards, and take appropriate action if they are not. Second, SEAs must determine whether LEAs are satisfying the legal requirements that they monitor the Title I programs in schools within their jurisdiction. Third, the general provisions section of the Improving America's Schools Act requires states to enforce the law and ensure that all Title I programs comply with the Title I law and with the state and local plans.[36]

Under Title I, each SEA receiving funds must:

- annually review the progress of each LEA receiving funds to determine whether the schools in that LEA are making adequate progress toward meeting the state's student performance standards, and publicize and disseminate the results of that review to LEAs, teachers, and other staff, parents, students, and the community.

- make technical assistance available to the schools farthest from meeting the state's challenging performance standards, if requested by the school or the LEA. Such technical assistance might include providing information about successful schoolwide programs, or conducting in-services for school personnel and parents designing a school improvement plan.

- identify for improvement any LEA which, for two consecutive years, has not made adequate yearly progress toward enabling those students served in the schools within its jurisdiction to meet the state standards, or which has failed to meet the state's transitional criteria (those used prior to the implementation of the permanent assessment scheme on which the adequate yearly progress determination is made).

- provide technical assistance to LEAs in improvement to develop and implement a revised plan "that will have the greatest likelihood of improving the performance of schools" in the LEA in enabling students to meet the state performance standards.

- identify for corrective action those LEAs in improvement which are not improving. SEAs may take corrective action against LEAs in improvement at any time, but must take such action against LEAs during the fourth year after placing an LEA in improvement, if they are still not making adequate progress. Corrective action must be consistent with state law, but could include, for example, withholding funds, reconstituting the school district personnel, removing particular schools from the LEA's jurisdiction, or appointing a receiver or trustee. An SEA must provide due process and a hearing to an LEA prior to

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[35] ESEA, at section 1116; 20 U.S.C. § 6317.

[36] ESEA at § 14303; 20 U.S.C § 8853. Some sections of the General Education Provisions Act also apply to Title I. *See* 20 U.S.C. § 1221 *et seq.*

taking corrective action, if the state law provides for due process and a hearing.

• take corrective action against an LEA it deems has failed to carry out its responsibilities to provide technical assistance to schools or take corrective action against schools which are not making adequate yearly progress toward enabling all students to meet the state standards.

2. Local Educational Agency

In addition to requirements it must meet under Title I, Title XIV obligates LEAs to adhere to all requirements of the law, and monitor schools' compliance with and enforce the law.[37] Under Title I, Local Educational Agencies receiving Title I funds must:

• annually review each school receiving Title I funds, using the state assessments and any additional measures described in the LEA plan, to determine if the school is making adequate yearly progress towards enabling the students in that school to meet the state performance standards. The results of the review must be publicized and disseminated to teachers and staff, parents, students, and the community.

• identify for improvement any school which: (a) has not made adequate yearly progress toward enabling those students served to meet the state standards for two consecutive years; (b) has been in program improvement under the 1988 law for two consecutive years and still is not making adequate progress; or (c) has failed for two years to meet the state's transitional criteria for making progress (those criteria used prior to the implementation of the permanent assessment scheme on which the adequate yearly progress determination is made).

• assist schools in school improvement, in collaboration with parents, in developing or revising a school plan in order to improve the achievement of students in the school.

• identify for corrective action those schools in school improvement which are not improving. LEAs may take corrective action against such schools at any time, but must take such action against schools during the third year following identification for school improvement, if they are still not making adequate progress. Corrective action must be consistent with state and local law, but could include, for example, withholding funds, reconstituting the school staff, removing decision-making authority from the school, or authorizing students to transfer to another public school within the LEA.

WHAT TO DO

Oversight Procedures Under Title I

★ Make sure that parents are involved in the annual review of LEAs and schools' Title I programs, as required by law.

★ In the process of reviewing programs, make sure that states and LEAs are ensuring that Title I students are being taught the same curriculum as all other students, not a watered-down version which will never enable them to meet the state standards.

★ Work with your state to ensure that school and LEA improvement is a process by which LEAs and schools sit down and examine what is wrong with their program and thoughtfully outline a process for improving it.

[37] ESEA at § 14306; 20 U.S.C. § 8856.

IV. How Advocates Can Reach and Assist Parents

A. How to Reach Parents

There are a variety of ways for legal services programs and other advocates to make contact with Title I parents.

- Some school districts have paid Title I parent coordinators who may be very helpful.
- There may be formal parent advisory councils or other parent organizations, with parent officers, at the district or school level.
- The school or district may agree to include a notice from or about you in mailings to Title I parents.
- You can request to speak and/or distribute information at the annual Title I parent meeting.
- The National Coalition of Title I Parents, Edmonds School Building, 9th & D Streets, N.E., Washington, D.C. 20002, (202) 547-9286 may have members in the school district.
- Head Start programs may provide contacts with active parents.
- Legal Services clients with whom you work on other issues are often Title I parents.
- Organizations in your community may have effectively reached out to parents. Determine how you can work with their existing network. Community groups and other organizations such as churches, civic organizations, civil rights groups, or youth organizations often work with parents in varied capacities.

  If organizations in your community do not work with parents, determine where in the community parents spend time and how you can reach them where they are. For example, you might consider asking a local business or shopping center if you can have a booth on the premises where you can provide parents with information about education issues.

B. How to Assist Parents

There are a range of ways for you and your team to assist other parents to get them more involved in Title I and help develop sustained parent involvement in their schools.

1. Information

You can provide information to parents about the Title I law, the Title I programs in their schools, and how they can become involved to make Title I work for their children. You can also inform parents about other information that exists (perhaps distributed by the school or available from community organizations which work on education issues), and help parents get this information.

2. Training

You can provide parents with ongoing training so that they can take advantage of

their rights to be involved. These trainings should generally focus on parents' rights and program requirements, especially as they relate to the quality of the programs.

Such trainings can help prepare parents for the annual meetings and other meetings, for their role in the development of parent involvement policies, and in the design and implementation of the programs. Ongoing training can also provide parents with the important skills necessary to play a role in monitoring the programs and advocating for change when necessary.

Consider concentrating on preparing a core group of parent leaders to train and work with other parents.

3. Support for parents' efforts to work together to carry out the requirements of the law

You can provide parents with the support they request for their efforts to work together to implement the requirements of the parental involvement section of the law. Existing parent organizations frequently need ongoing support which you can also make available.

4. Liaison between parents and schools

You can serve as a liaison between parents and schools in order to bridge broken down lines of communication and support positive ones.

5. Collaboration on the development of goals

It may be important for you to work with parents on defining their goals; these goals not only can help sustain their involvement, but can become a means for organizing and involving other parents.

6. Help on individual problems

You can become an important resource to individual parents who need help on concrete problems facing their own children in the Title I program.

7. Administrative complaints and legal actions

Finally, you can aid parents in filing administrative complaints or developing legal actions, when necessary.

In most communities around the country in which parents have become successfully involved, information, training, and support have been key to their success. Remember, information, training and support for parents are required by the Title I law.

C. Additional Ideas for Parent Training

1. Determining the Context

If you are going to lead a parent training session, and are trying to plan an appropriate training, start by asking several key questions:

a) Who is the audience? Is it a group of new parents concerned about their own children? Title I parent leaders? A joint group of parents and Title I school staff (i.e., at the annual meeting)? Title I and other school staff alone? Someone else?

b) How much background does your

audience have in Title I and other school issues?

c) At what level is the training held — the state, district or school level?

d) During what time of the year is the training held and for what purposes? (i.e., is this the annual meeting or another regular meeting? Is this meeting for information purposes or largely for strategic development?)

Use the answers to these questions to design the training most suitable for your audience and its level of knowledge.

2. Other Suggestions

a) Always start the training by introducing yourselves, telling why you are there, and asking everyone present to introduce themselves.

b) Try to meet on neutral and easily accessible territory in which the invited parents will not feel threatened.

c) Try to limit an initial session for new parents to 1½ to 2 hours.

d) Try to get as much parent participation as possible during the meeting. Encourage parents to talk about what they want for their children, and how this may differ from what their children are actually getting.

e) Worry only about the parents who are there, not those who are not. This means that even if there is a low turn-out, proceed as planned. Make sure to make those parents who do show up feel important and involved.

f) Make your training as specific as possible to the context at hand. Refer to specific schools and people if possible. Get parents to contribute specific school experiences or problems.

g) Work to make the initial meeting spark interest in a follow-up meeting. Before closing, set the time and place for the next meeting. Try to involve at least some parents in setting the agenda for the next meeting.

h) Work continually with parents during the meeting to set concrete goals to pursue. Ask the kinds of questions (particularly regarding key issues affecting the quality of their children's education) and provide the types of information that will enable parents to understand what is possible and articulate what they really want for their children.

i) Learn about parents' concerns and interests, and what they want to do. Work with them on their agenda. If this means taking up something else first, such as report cards or a building problem, before delving into Title I, this is okay. Frequently strong parent involvement begins with parent mobilization around a specific cause.

j) Work with the parents to develop a work plan and focus on strategies.

k) Emphasize the importance, especially with recalcitrant school personnel, of parents' knowing their legal rights and presenting their concerns to schools through an organized parents' group.

l) Get feedback about the training.

V. Organizations and Resources That Parents Can Turn to for Help

A. Local Sources of Help

If you feel that you need outside help in obtaining or enforcing your or your child's rights under Title I, there are a variety of sources from which to obtain assistance.

1. Get professional advice from attorneys and staff at the **local legal aid or legal services program** in your community (if low-income parents are involved). The telephone numbers can be found in your local telephone book.

2. Ask the local and state **bar associations** about their *pro bono* programs. Most states require attorneys to spend a certain amount of time providing free legal assistance to low-income people. Through *pro bono* programs, private lawyers provide legal advice to low-income or non-profit organizations free or at little cost. Use the expertise of these private attorneys. Bar associations are listed in the phone book under the name of the city or state (for example, Idaho Bar Association).

3. Seek help from other **local community organizations**, such as local Urban Leagues, the local PTA, or other community organizations committed to education and/or to the particular interests of low-income children.

4. Take advantage of services or donations available from **local businesses**. These services may include publishing newsletters and providing in-house professionals to help or train parents.

5. Contact the **State Department of Education**. They are responsible for making sure that the local school systems are complying with the statute. They must ensure that school systems correct violations.

B. National Sources of Help

1. **National Coalition of Title I Parents**
   Edmonds School Building
   9th & D Streets, N.E.
   Washington, D.C. 20002
   (202) 547-9286

2. **U.S. Department of Education, Office of Compensatory Education Programs**
   Office of Elementary and Secondary Education
   1250 Maryland Avenue, SW
   Portals Building, Room 4400
   Washington, D.C. 20202-6132
   Mary Jean LeTendre, Director
   (202) 260-4021

3. **Center for Law and Education**
National Title I and School Reform
Advocacy Project
Center for Law and Education
1875 Connecticut Ave., N.W.,
Suite 510
Washington, D.C. 20009
(202) 986-3000 (phone)
(202) 986-6648 (fax)
HN1669@Handsnet.org (e-mail);
or 197 Friend Street, 9th Floor
Boston, MA 02114
(617) 371-1166 (phone)
(617) 371-1155 (fax)
HN0481@Handsnet.org (e-mail)

4. **Other national organizations that are committed to education and to the particular needs of low-income students, including:**

- Mexican American Legal Defense and Educational Fund
- NAACP Legal Defense and Educational Fund
- National Council of La Raza
- National Urban League and local Urban League chapters
- Parent-Teacher associations

Appendix: Excerpt from Title I Law

Pub, L. 103-382, Section 1119 - Professional Development

This is the text of Section 1119 of the Title I statute (20 U.S.C. § 6320). For additional information regarding professional development, *see* Title II of the Elementary and Secondary Education Act, as amended by the Improving America's Schools Act of 1994 (the Dwight D. Eisenhower Professional Development Program).

"SEC. 1119. PROFESSIONAL DEVELOPMENT. 20 USC 6320.

"(a) PROGRAM REQUIREMENTS.—

"(1) IN GENERAL.—Each local educational agency receiving assistance under this part shall provide high-quality professional development that will improve the teaching of the academic subjects, consistent with the State content standards, in order to enable all children to meet the State's student performance standards.

"(2) PROGRAM DESIGN.—Such professional development activities shall be designed by principals, teachers, and other school staff in schools receiving assistance under this part.

"(b) PROFESSIONAL DEVELOPMENT ACTIVITIES.—

"(1) REQUIRED ACTIVITIES.—Such professional development activities shall—

"(A) support instructional practices that are geared to challenging State content standards and create a school environment conducive to high achievement in the academic subjects;

"(B) support local educational agency plans under section 1112 and school plans under section 1114;

"(C) draw on resources available under this part, title III of the Goals 2000: Educate America Act, title II of this Act, and from other sources;

"(D) where appropriate, as determined by the local educational agency, include strategies for developing curricula and teaching methods that integrate academic and vocational instruction (including applied learning and team teaching strategies); and

"(E) include strategies for identifying and eliminating gender and racial bias in instructional materials, methods, and practices.

"(2) OPTIONAL ACTIVITIES.—Such professional development activities may include—

"(A) instruction in the use of assessments;

"(B) instruction in ways that teachers, principals, pupil services personnel, and school administrators may work more effectively with parents;

"(C) the forming of partnerships with institutions of higher education to establish school-based teacher training programs that provide prospective teachers and novice teachers with an opportunity to work under the guidance of experienced teachers and college faculty;

"(D) instruction in the use of technology;

"(E) the creation of career ladder programs for paraprofessionals (assisting teachers under this part) to obtain the education necessary for such paraprofessionals to become licensed and certified teachers;

"(F) instruction in ways to teach special needs children;

"(G) instruction in gender-equitable education methods, techniques, and practices;

"(H) joint professional development activities involving programs under this part, Head Start, Even Start, or State-run preschool program personnel; and

"(I) instruction in experiential-based teaching methods such as service learning.

"(c) PROGRAM PARTICIPATION.—Each local educational agency receiving assistance under this part is encouraged to design professional development programs so that—

"(1) all school staff in schools participating in a schoolwide program under section 1114 can participate in professional development activities; and

"(2) all school staff in targeted assistance schools may participate in professional development activities if such participation will result in better addressing the needs of students served under this part.

"(d) PARENTAL PARTICIPATION.—Parents may participate in professional development activities under this part if the school determines that parental participation is appropriate.

"(e) CONSORTIA.—In carrying out such professional development programs, local educational agencies may provide services through consortia arrangements with other local educational agencies, educational service agencies or other local consortia, institutions of higher education, or other public or private institutions or organizations.

"(f) EFFECTIVE TEACHING STRATEGIES.—Knowledge of effective teaching strategies that is gained through professional development activities under this section may be shared with teachers who are not participating in targeted assistance programs under this part.

"(g) COMBINATIONS OF FUNDS.—Funds provided under this part that are used for professional development purposes may be combined with funds provided under title II of this Act, title III of the Goals 2000: Educate America Act, and other sources.

"(h) STATE REVIEW.—

"(1) IN GENERAL.—The State educational agency shall review the local educational agency's plan under section 1112(b) to determine if such agency's professional development activities—

"(A) are tied to challenging State student content and student performance standards;

"(B) reflect research on teaching and learning where possible;

"(C) are designed to have a positive impact on the teacher's performance in the classroom;

"(D) contribute to continuous improvement in the classroom or throughout the school;

"(E) include methods to teach children with special needs;

"(F) are developed with the extensive participation of teachers; and

"(G) include gender-equitable education methods, techniques, and practices.

"(2) TECHNICAL ASSISTANCE.—If a local educational agency's plan for professional development does not include the activities described in paragraph (1), the State educational agency shall provide technical assistance to such local educational agencies to enable such agencies to make progress toward inclusion of such activities in the local educational agency's professional development activities.

"(3) SPECIAL RULE.—No State educational agency shall require a school or a local educational agency to expend a specific amount of funds for professional development activities

under this part, except that this paragraph shall not apply with respect to requirements under section 1116(d)(6).

"(i) INSTRUCTIONAL AIDES.—

"(1) IN GENERAL.—If a local educational agency uses funds received under this part to employ instructional aides, the local educational agency shall ensure that such aides—

"(A) possess the knowledge and skills sufficient to assist participating children in meeting the educational goals of this part;

"(B) have a secondary school diploma, or its recognized equivalent, or earn either within two years of employment, except that a local educational agency may employ an instructional aide that does not meet the requirement of this subparagraph if such aide possesses proficiency in a language other than English that is needed to enhance the participation of children in programs under this part; and

"(C) are under the direct supervision of a teacher who has primary responsibility for providing instructional services to eligible children.

"(2) INCLUSION IN ACTIVITIES.—Each local educational agency receiving funds under this part, when feasible, shall include instructional aides in professional development activities.